

REMARKS

Claims 1-18 are currently pending in the application, of which claims 1, 5, 12, 16, and 18 are independent claims. Applicant appreciates the indication that claims 3 and 9-10 contain allowable subject matter.

In view of the following remarks, Applicant respectfully requests reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

Claim Objection

In the Office Action, claims 3 and 9-10 were objected to as being dependent on rejected base claims. Applicant will show below that the rejections of the corresponding base claims should be withdrawn.

Accordingly, Applicant submits that claims 3 and 9-10 are in condition for allowance. Thus Applicant respectfully requests that these objections be withdrawn.

Rejections Under 35 U.S.C. §103

Claims 1, 2, 4-8, and 11-15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,977,940 issued to Akiyama, *et al.* ("Akiyama") in view of no other reference. Applicant respectfully traverses this rejection for at least the following reasons.

In order to render a claim obvious, the combination of cited references must teach each and every element of the claimed invention and must provide teaching, motivation or suggestion to combine. Nat'l Steel Car, Ltd. v. Canadian Pac. Rwy., 357 F.3d 1319, 1337 (Fed. Cir. 2004) (citing Ecolochem, Inc. v. S. Cal. Edison Co., 227 F.3d 1361, 1371 (Fed. Cir. 2000)). This motivation must be based on the knowledge in the art, not knowledge provided by the

application under examination, because such hindsight reconstruction is forbidden. In re Fine, 837 F.2d 1071, 1075 (Fed. Cir. 1988).

As to claim 1, the claim recites an “LCD comprising ... a memory cell unit for receiving the first control signal and second control signal from the control signal line unit.” The Examiner admits that *Akiyama* does not teach at least “a memory cell unit for receiving the first control signal and second control signal from the control signal line unit.” Office Action, p. 9, paragraph 6. The Examiner should show that each and every element of the invention is taught in the art, either in a single reference or in a combination of references. To fail to show how the prior art teaches each and every element is to fail to show a *prima facie* case for obviousness.

However, the Examiner does not provide any teaching, motivation, or suggestion to combine *Akiyama* with some other knowledge in the art. The Examiner just describes the benefits of the present invention: “accommodate driving of still image and moving image signals, and facilitate reduction of power of LCD driver.” The Examiner does not show that there was any teaching, motivation, or suggestion to obtain such benefits. Even if such a desire for such benefits were shown, the Examiner would still have to show teaching, motivation, or suggestion to make **the claimed combination** to achieve the fulfillment of that desire. Thus, the single reference does not render claim 1 obvious.

Claims 2 and 4 depend from claim 1, and thus are non-obvious for at least the reasons of claim 1.

As to claim 5, the claim recites an “LCD comprising ... a power unit for supplying a first power, a second power and a third power to all pixels from outside of a pixel area of the LCD panel.” The Examiner admits that *Akiyama* does not teach at least “a power unit for supplying a first power, a second power and a third power to all pixels from outside of a pixel area of the

LCD panel.” Office Action, p. 10, paragraph 6. The Examiner should show that each and every element of the invention is taught in the art, either in a single reference or in a combination of references. To fail to show how the prior art teaches each and every element is to fail to show a *prima facie* case for obviousness.

However, the Examiner does not provide any teaching, motivation, or suggestion to combine *Akiyama* with some other knowledge in the art. The Examiner just describes the benefits of the present invention: “to reduce power consumption.” The Examiner does not show that there was any teaching, motivation, or suggestion to obtain such benefits. Even if such a desire for such benefits were shown, the Examiner would still have to show teaching, motivation, or suggestion to make **the claimed combination** to achieve the fulfillment of that desire. Further, the cited benefit does not appear to directly relate to the aspect “outside of a pixel area of the LCD panel.” Thus, the single reference does not render claim 5 obvious.

Claims 7-8 and 11 depend from claim 5, and thus are non-obvious for at least the reasons that claim 5 is non-obvious.

As to claim 12, the claim recites an “LCD comprising ... when the first control signal is in low state and the second control signal is in high state.” The Examiner admits that *Akiyama* does not teach at least “when the first control signal is in low state and the second control signal is in high state.” Office Action, p. 12, paragraph 6. The Examiner should show that each and every element of the invention is taught in the art, either in a single reference or in a combination of references. To fail to show how the prior art teaches each and every element is to fail to show a *prima facie* case for obviousness.

However, the Examiner does not provide any teaching, motivation, or suggestion to combine *Akiyama* with some other knowledge in the art. The Examiner does not expressly state

any reason why it would have been obvious. The Examiner does not show that there was any teaching, motivation, or suggestion to obtain this result. Even if such a desire for such a result were shown, the Examiner would still have to show teaching, motivation, or suggestion to make **the claimed combination** to achieve the result. Further, the cited benefit does not appear to directly relate to the aspect “outside of a pixel area of the LCD panel.” Thus, the single reference does not render claim 12 obvious.

Claims 13-15 depend from claim 12 and thus are non-obvious for at least the reasons that claim 12 is non-obvious.

Claims 16-17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Akiyama* in view of no other reference. Applicant respectfully traverses this rejection for at least the following reasons.

In the present case, the claim recites an “LCD comprising ... a level shift unit in electrical communication with the second control signal for generating an inverting signal and increasing a voltage.” The Examiner admits that *Akiyama* does not teach at least “a level shift unit in electrical communication with the second control signal for generating an inverting signal and increasing a voltage.” Office Action, p. 6, paragraph 3. The Examiner should show that each and every element of the invention is taught in the art, either in a single reference or in a combination of references. To fail to show how the prior art teaches each and every element is to fail to show a *prima facie* case for obviousness.

However, the Examiner does not provide any teaching, motivation, or suggestion to combine *Akiyama* with some other knowledge in the art. Although the Examiner states that it could be modified as the Examiner suggests “for the purpose of setting the amount of voltage needed,” the Examiner does not show that there was such a need in the art. Even if a need were

shown, the Examiner would still have to show teaching, motivation, or suggestion to make the claimed combination to achieve the solution to that need. Thus, the single reference does not render claims 16-17 obvious.

Claim 18 stands rejected under 35 U.S.C. §103(a) as being unpatentable over *Akiyama* in view of no other reference. Applicant respectfully traverses this rejection for at least the following reasons.

As to Claim 18, the claim recites an “LCD comprising ... a source and scan driver being inactivated for a second period and providing at least one of the stored image signal and an inversion signal to the stored image signal for the liquid crystal capacitor during second period.” The Examiner admits that *Akiyama* does not teach at least “a source and scan driver being inactivated for a second period and providing at least one of the stored image signal and an inversion signal to the stored image signal for the liquid crystal capacitor during second period.” Office Action, p. 7, paragraph 4. However, the Examiner does not provide any teaching, motivation, or suggestion to combine *Akiyama* with some other knowledge in the art. Although the Examiner states that it could be modified as the Examiner suggests “for the purpose of inverting the polarity of a given signal in a desired fashion,” the Examiner does not show that there was such a desire in the art. Even if such a desire were shown, the Examiner would still have to show teaching, motivation, or suggestion to make the claimed combination to achieve the fulfillment of that desire. Thus, the single reference does not render claim 18 obvious.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §103(a) rejection of claims 1-2, 4-8, and 11-18. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention,

Applicant respectfully submits that independent claims 1, 5, 12, 16, and 18, and all the claims that depend from them are allowable.

Allowable Subject Matter

Applicant appreciates the indication that claims 3 and 9-10 contain allowable subject matter. As explained above, Applicant has shown that the rejections of the corresponding base claims should be withdrawn.

Accordingly, Applicant submits that claims 3 and 9-10 are in condition for allowance.

CONCLUSION

Applicant believes that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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